



**SIERRA
CLUB**

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January 17, 2025

Re: Request for Information To Support Program Design for the [2025-2027 Conservation and Load Management Programs](#)

Dear Ms. Santiago-Bejarano,

On behalf of the Sierra Club and our more than 30,000 members and supporters in Connecticut, thank you for the opportunity to provide comments in response to DEEP's Request for Information (RFI) to Support Program Design for the 2025-2027 Conservation and Load Management (C&LM) Programs. Below are overall general comments as well as responses to specific questions asked in the RFI.

The C&LM program is critically important to equitably reduce energy consumption, energy costs, and the associated pollution impacting Connecticut's air and our climate. The building sector in Connecticut is responsible for 30% of the state's total climate-harming greenhouse gas emissions, and an astonishing 23% of health-harming NOx emissions. That's more than eight times all power plants combined. With just 5 years to achieve the state's statutorily mandated 45% reduction in greenhouse gas emissions by 2030, and no-time to wait to reduce the health harms of NOx emissions, the 2025-27 C&LM plan must make significant progress in reducing harmful emissions and accelerating electrification.

While the overall budget for the C&LM plan is not set in this process it should be noted that the \$706 million budget over three years is not adequate. Given the critical importance of energy efficiency to reduce energy costs, it is essential that more funding be allocated. Mass Save's proposed three year plan will increase its program by 25% to \$5 billion. On a per capita basis, Massachusetts is investing 250% more than Connecticut in energy efficiency.

Question 4. Non-income eligible customers, residing in environmental justice communities have the potential of being deemed eligible for gas combustion equipment incentives and rebates based on their geographic location. Why is this a prudent or imprudent approach? What additional eligibility criteria might be important to consider in addition to being in an environmental justice community when determining eligibility for gas incentives?

Sierra Club believes this is an imprudent approach. Incentives should not run at counterpurposes to the state's greenhouse gas emission reduction goals. No incentives should be given for fossil fuel equipment. Electrification has been identified as the key pathway in Connecticut's planning processes, policy guidance, and federal grant applications including

the Comprehensive Energy Strategy and Connecticut's Priority Climate Action Plan to the U.S. Environmental Protection Agency ("EPA") under the federal Climate Pollution Reduction Grant program, and the PURA decision to end the Gas System Expansion Plan early, finding that gas expansion does not advance the state's climate and energy goals. These are incentives to catalyze market transformation. No one is mandated to switch, and folks who want to stick with harmful fossil fuel equipment can do so, just without an incentive.

A blanket exception, as proposed in this plan, could result in low-income households left with the increased costs of the gas distribution system because it is spread over fewer rate payers as wealthier households transition to electrified solutions. It also could result in giving non-income eligible customers incentives.

However, if exceptions must be made, they should be made on a case by case basis. And, if changes are not made to the blanket exception in the current draft plan, data on every gas combustion equipment incentive and rebate should be collected, analyzed and presented to inform annual updates.

Question 6. How should the programs educate customers on incentive options and associated bill impacts to help identify the most cost-effective option? Should heat pumps be discussed even if heating costs may be higher than an alternative? Why or why not?

Yes, heat pump hot water heaters, heat pumps for space heating, and heat pump dryers should all be discussed so that the customer knows what is available. The purchase and operational costs should be discussed, as should the indoor air quality impacts, the added benefits of cooling in the summer, and the dehumidifying effect of heat pump hot water heaters. Many people are interested in reducing their climate impact and improving the indoor air quality in their homes even if it could cost more.

Question 11. During the 2022-2024 term, the Companies hosted a series of landlord roundtables in partnership with local organizations to reach more landlords and tenants to gain insight on how to encourage multifamily building owners to participate in the energy efficiency programs (2025-2027 C&LM Plan, p.79). What programmatic changes or strategies could be incorporated into the 2025-2027 C&LM Plan to reach more tenants and landlords to increase the market penetration of weatherization and energy efficiency in multifamily housing?

The companies should continue to engage landlords and tenants to reach tenant occupied housing. Mass Save's proposed three year plan aims to reach more tenants through a variety of new programmatic approaches including incentives for landlords of buildings rental units in environmental justice communities, which have high percentages of renters and low- and moderate-income residents.

We feel this is a promising approach, but caution that a tenant protection policy should be in place to ensure the benefits flow through to the tenant, that rent is not increased or evictions are not issued as a result of the incentive.

14. Should weatherization be a requirement for customers to receive a heat pump rebate? Why or why not?

Connecticut has a goal of 80% of homes weatherized, and a requirement would help meet that goal. For whole-home space heating with a heat pump, weatherization as described on page 35 of the plan should be in place to reduce demand first to get the right size heat pump. Weatherization should not be required for heat pump hot water heaters or heat pump dryers or heat pump window units.

15. If you believe weatherization should be required, what should the minimum standard for weatherization be for a home that is heated and cooled by a heat pump?

A home with a whole home heat pump system for heating and cooling should be weatherized using the criteria listed on page 35 of the plan.

Question 20. Cooling degree days have increased in Connecticut by approximately 26 percent since 1960. Due to the increased need for cooling, should C&LM programs start considering full home air conditioning to be the baseline standard for healthy housing? Why or why not?

C&LM should provide cooling for health and safety reasons and to reduce consumption. Globally, the last 10 years have been the hottest on record. Heat is the deadliest extreme weather event, and those most vulnerable to the impacts of high heat are the elderly, young children, and people with heart disease and respiratory conditions, and people in inadequately weatherized housing. During stretches of hot days this summer, Connecticut's hospitals saw an uptick in heat-related emergency room admissions. Electricity consumption shot up as people turned on air conditioning.

A cooling strategy should be developed to reduce consumption and protect vulnerable populations. Heat pumps are not just for heating as they double as air conditioning. A cooling strategy should include heat pump window units, not just whole home systems. Those that participate should be educated on operating the units for heating.

Question 24. Are there specific customer groups within environmental justice communities that should be prioritized by the C&LM programs (e.g. customers using delivered fuels, renters, small businesses)? What opportunities exist to best reach and encourage program participation by these customer groups?

Renters should be prioritized as the hardest to reach customer group. Renters are more likely to experience energy burden in part because their housing and appliances are less likely to be weatherized and updated.

Question 26. Should rent protections be included as a requirement in the Conservation and Load Management programs? If so, what parameters do stakeholders recommend putting in place for this change (e.g., enforcement, duration)?

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Skyrocketing rents and evictions are contributing to a housing crisis in Connecticut. Tenants require protections to ensure that rent will not increase and evictions will not take place for a minimum of 3 years as a result of energy efficiency or clean energy improvements through the EnergizeCT program. Enforcement should include a full payback of the incentives.

Question 39. With increased market penetration rates of heat pumps and other electrification measures, Connecticut's peak demand for electricity could shift from summer to winter by the mid 2030's. This shift could stress already constrained generation resources and require additional planning to ensure grid reliability. How should the Conservation & Load Management programs track, account, and potentially respond to measure impacts on winter peak demand?

ISO NE is the entity charged with balancing supply and load in our region, however, DEEP should be tracking and projecting for our state and, in addition to accelerating weatherization, should be planning and developing distributed renewable solar and battery resources and demand response for an orderly transition to electrification.

Thank you for your consideration of our comments.

Sincerely,

Samantha Dynowski, State Director
Sierra Club Connecticut Chapter